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OF TRUSTEES OF THE LELAND  
STANFORD JUNIOR UNIVERSITY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN JOSE DIVISION

JANE DOE,

Plaintiff,

v.

STANFORD UNIVERSITY,

Defendant.

Civil Action No. 3:16-cv-06973-EJD

**DECLARATION OF SARAH G.  
FLANAGAN IN SUPPORT OF  
DEFENDANT'S STATEMENT OF  
NON-OPPOSITION**

Date: March 16, 2017

Time: 9:00 a.m.

Dept: Courtroom 4, 5th Floor

Judge: Hon. Edward J. Davila

I, Sarah G. Flanagan, declare as follows:

1. I am a member of the State Bar of California and of the law firm Pillsbury Winthrop Shaw Pittman LLP. I am lead counsel for Defendant THE BOARD OF TRUSTEES OF THE LELAND STANFORD JUNIOR UNIVERSITY ("Stanford") in the above-captioned matter.

2. I submit this declaration in support of Stanford's Statement of Non-Opposition to the Motion for Leave To Proceed Using Pseudonym filed by Plaintiff Jane Doe ("Plaintiff") on

1 December 15, 2016 (the “Motion”). I have personal knowledge of the facts stated herein and, if  
2 called as a witness, I could and would competently testify hereto.

3 3. Plaintiff’s counsel, John Clune, and I spoke on December 12, 2016, about  
4 Plaintiff’s planned motion to be allowed to proceed using a pseudonym in this lawsuit. I said  
5 that Plaintiff would have to otherwise conduct herself during the litigation in accord with her  
6 request for privacy and that Stanford would want all of the Stanford students, current and former,  
7 who might be named in public filings to be given the same privacy consideration. I informed  
8 Mr. Clune that I would check but that I believed that Stanford would not oppose the motion on  
9 the conditions that Plaintiff will not make any public statements under either her real name or  
10 pseudonym during the pendency of the matter and that all Stanford students or former students  
11 will be similarly identified by pseudonym in any public filings. That same day Mr. Clune sent  
12 me proposed language describing those conditions for use in the planned motion. Based on  
13 Plaintiff’s agreement to those conditions, Stanford agreed not to oppose the planned motion. On  
14 December 14, 2016, Plaintiff, through her counsel Kimberly Hult, confirmed her agreement to  
15 those conditions. I note that Plaintiff’s agreement is also confirmed in footnote 1 of the Motion.

16 I declare under penalty of perjury under the laws of the State of California that the  
17 foregoing is true and correct.

18 This declaration was executed this 29th day of December, 2016, at San Francisco,  
19 California.

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21 By: /s/ Sarah G. Flanagan  
22 Sarah G. Flanagan  
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